

EXHIBIT A

From: [David Simons](#)
To: [Stameshkin, Liz](#); [Lauter, Judd](#); [Dunning, Angela L.](#); [Kathleen Hartnett](#); [mlemley@lex-lumina.com](#); [Ghajar, Bobby A.](#); [Ghazarian, Colette A](#)
Cc: [Jesse Panuccio](#); [Poppell, Cole A](#); [Biksa, Liene](#); [Weinstein, Mark](#); [Alvarez, Jessica](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSF](#); [Josh Schiller](#); [David Boies](#); [Maxwell Pritt](#); [z/Meta-Kadrey](#)
Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines
Date: Friday, October 11, 2024 3:30:32 PM

Confirmed, thanks Liz. Will you prepare a stipulation? Someone else from Plaintiffs can review and provide final sign off since I'll be offline.

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 6:27 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>
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Subject: RE: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

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Great – we have sign off on the below, which I believe reflects the parties' agreements over these emails but please confirm.

Case Event	Compromise Proposal
Serve Additional Written Discovery Requests	October 18, 2024
Meet/Confer re: Existing Written Discovery	Wednesday, October 16 (per the parties earlier agreement over email)
Exchange Supplemental Initial Disclosures	Monday, October 21
Letter Briefs re: Existing Written Discovery	Wednesday, October 23
Close of Fact Discovery	December 13, 2024
Expert Reports	
Opening Expert Reports Due	January 10, 2025
Rebuttal Expert Reports Due	Feb. 3, 2025
Close of Expert Discovery	Feb. 26, 2025

Summary Judgment and Daubert Motions	
Opening MSJ/ <i>Daubert</i> Briefs Due	March 7, 2025
Opposition to MSJ/ <i>Daubert</i> Briefs Due	April 3, 2025
Reply MSJ/ <i>Daubert</i> Briefs Due	April 17, 2025
Motion for Summary Judgment Hearing	May 1, 2025

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 3:16 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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[External]

Assuming we have agreement on everything else, that's OK. Thanks.

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 6:14 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Hi David – we are very close – while we are getting final client sign off, would you be amenable to moving the date for initial disclosures to October 21?

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 3:11 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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[External]

Hi Liz, the Jewish holiday is starting imminently here on the East Coast. Any update on your end? Thanks.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 5:13 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

Hi Liz,

Thanks for the prompt reply.

1. In the interest of reaching agreement, we can agree to dates of April 3 and April 17 for the last two deadlines.
2. Sure, we mean that both parties will go back over their FRCP 26 initial disclosures and update them based on information that has come to light during discovery or otherwise due to the passage of time. We understand that this is a continuing obligation for both parties, but believe it would be beneficial to have a date certain by which both parties commit to undertake this exercise in the first instance.

Best,
David

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 5:00 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Hi David,

We are looking at the below but while we are discussing internally, we wanted to note a few things:

- We do not believe Judge Chhabria will want a schedule that doesn't provide him with 2 full weeks between filing of replies and the hearing.
- Could you explain what you mean by "Exchange Supplemental Initial Disclosures"?

Best,

Liz

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 1:52 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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[External]

Counsel,

Given the short time remaining before the Jewish holiday begins on the East Coast, Plaintiffs have quickly developed a compromise proposal that largely splits the difference on expert dates and summary judgment/Daubert, and also seeks agreement to codify a limited subset of additional deadlines that will facilitate discovery moving forward expeditiously. Please let us know whether this proposal is acceptable. Should Meta disagree, Plaintiffs reserve all rights to propose other discovery deadlines. Thanks.

Best,
David

Case Event	Plaintiffs' Proposed Deadline	Defendant's Proposal	Compromise Proposal
Serve Additional Written Discovery Requests	Fri Oct 11, 2024	October 18, 2024	October 18, 2024
Identification of Add'l Document Custodians/Deponents	Fri Oct 11, 2024	N/A	
Letter Briefs re: Add'l Custodians/Deponents	Fri Oct 11, 2024	Letter Brief re: Add'l Deposition(s) – Fri Oct 11, 2024 Letter Brief re: Add'l Custodians – after meet and confer is complete, pursuant to ESI Order protocols.	N/A given that the briefing on depositions is going in today.
Meet/Confer re: Existing Written Discovery	Mon Oct 14, 2024	N/A	Wednesday, October 16 (per the parties earlier agreement over email)
Exchange updated Privilege Logs	Wed Oct. 16, 2024	N/A	
Meet & Confer re: Updated Privilege Logs	Wed Oct. 23, 2024	N/A	
Exchange Supplemental Initial Disclosures	Wed Oct 16, 2024	N/A	Wednesday, October 16
Motion for Leave to Amend Complaint	Fri Oct 18, 2024	N/A	
Letter Briefs re: Existing Written Discovery	Fri Oct 18, 2024	N/A	Wednesday, October 23
Responses To Add'l Discovery (served by 10/11)	Mon Nov 4, 2024	N/A (Federal Rules Apply)	
Documents/Priv. Logs for Add'l Discovery (served by 10/11)	Thu Nov 7, 2024	N/A (Federal Rules Apply)	

Meet/Confer re: Responses to Addt'l Discovery (served by 10/11)	Wed Nov 13, 2024	N/A	
Letter Briefs re: Addt'l Discovery (served by 10/11)	Fri Nov 15, 2024	N/A (Local Rules Apply)	
Close of Fact Discovery	December 13, 2024	December 13, 2024	December 13, 2024
Expert Reports			
Opening Expert Reports Due	Fri Jan 10, 2025	January 10, 2025	Same
Rebuttal Expert Reports Due	Wed Feb 5, 2025	January 31, 2025	Feb. 3, 2025
Close of Expert Discovery	Wed Feb 26, 2025	February 21, 2025	Feb. 26, 2025
Summary Judgment and Daubert Motions			
Opening MSJ/Daubert Briefs Due	Wed Mar 12, 2025	February 28, 2025	March 7, 2025
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Reply MSJ/Daubert Briefs Due	Wed Apr 23, 2025	April 17, 2025	April 18, 2025
Motion for Summary Judgment Hearing	Thu May 1, 2025	May 1, 2025	Same

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 2:59 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L.

<adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: RE: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

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Counsel,

Below are our proposed dates. If you are agreeable to our proposal (which includes removing the dates that we do not think are necessary for this schedule), we can get this on file. If we have disputes, we would suggest both sides have a short (half page) position statement as to our proposed schedule.

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Serve Additional Written Discovery Requests	Fri Oct 11, 2024	October 18, 2024
Identification of Addt'l Document Custodians/Deponents	Fri Oct 11, 2024	N/A
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Letter Briefs re: Addt'l Discovery (served by 10/11)	Fri Nov 15, 2024	N/A (Local Rules Apply)
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Expert Reports		
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Reply MSJ/Daubert Briefs Due	Wed Apr 23, 2025	April 17, 2025
Motion for Summary Judgment Hearing	Thu May 1, 2025	May 1, 2025

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 8:29 AM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

[External]

Counsel, following up on the below from yesterday. I do not believe we have received a response. Please let us know if we can stipulate to these deadlines. FYI, certain members of our team (including me) will be observing the Jewish holiday starting in a few hours on the East Coast so we would appreciate reaching resolution promptly. Thanks.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:57 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

Counsel,

Per the Court's Order, below are Plaintiffs' proposed deadlines for the remainder of discovery. Please advise if Defendant is willing to stipulate to these deadlines or otherwise let us know Defendant's position so we can meet and confer as necessary. Thanks.

Case Event	Proposed Deadline
Additional Written Discovery Requests	Fri Oct 11, 2024
Identification of Addt'l Document Custodians/Deponents	Fri Oct 11, 2024

Letter Briefs re: Addt'l Custodians/Deponents	Fri Oct 11, 2024
Meet/Confer re: Existing Written Discovery	Mon Oct 14, 2024
Exchange updated Privilege Logs	Wed Oct. 16, 2024
Meet & Confer re: Updated Privilege Logs	Wed Oct. 23, 2024
Exchange Supplemental Initial Disclosures	Wed Oct 16, 2024
Motion for Leave to Amend Complaint	Fri Oct 18, 2024
Letter Briefs re: Existing Written Discovery/Priv. Logs	Fri Oct 18, 2024
Responses To Addt'l Discovery (served by 10/11)	Mon Nov 4, 2024
Documents/Priv. Logs for Addt'l Discovery (served by 10/11)	Thu Nov 7, 2024
Meet/Confer re: Responses to Addt'l Discovery (served by 10/11)	Wed Nov 13, 2024
Letter Briefs re: Addt'l Discovery (served by 10/11)	Fri Nov 15, 2024
Close of Fact Discovery	December 13, 2024
Expert Reports	
Opening Expert Reports Due	Fri Jan 10, 2025
Rebuttal Expert Reports Due	Wed Feb 5, 2025
Close of Expert Discovery	Wed Feb 26, 2025
Summary Judgment and Daubert Motions	
Opening MSJ/Daubert Briefs Due	Wed Mar 12, 2025
Opposition to MSJ/Daubert Briefs Due	Wed Apr 9, 2025
Reply MSJ/Daubert Briefs Due	Wed Apr 23, 2025
Motion for Summary Judgment Hearing	Thu May 1, 2025

From: David Simons <dsimons@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:16 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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<mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Plaintiffs' Third Set of Interrogatories

Counsel,

Please see attached. As per the letter Plaintiffs sent on October 9, please advise us promptly if you will consent to an increase in the number of interrogatories, otherwise we will raise that issue with Judge Hixson. We are available to meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Wednesday, October 9, 2024 6:46 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Plaintiffs' Fifth Set of RFPs

Counsel,

Please see attached. If you have any questions or objections, please let us know promptly so we can meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Wednesday, October 9, 2024 6:34 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen

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Subject: Re: Kadrey v. Meta - Plaintiffs' First Set of RFAs

Counsel,

Please see attached. If you have any questions or objections, please let us know promptly so we can meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Tuesday, October 8, 2024 8:14 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Amended Notice of 30(b)(6) Deposition:

Counsel,

Please find attached an amended notice of a 30(b)(6) deposition for Meta Platforms, Inc. We are happy to discuss scheduling at your earliest convenience given Judge Hixson's order regarding the amount of time Plaintiffs will have, which will necessitate multiple deposition days. If you anticipate lodging any objections to the amended notice, please let us know promptly so we can begin the meet and confer process. Thanks.

Best,
David

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